

ILLINOIS COMMERCE COMMISSION

ICC DOCKET No. 13-0105

DIRECT TESTIMONY

OF

LEONARD M. JONES

Submitted On Behalf

Of

AMEREN ILLINOIS COMPANY

d/b/a Ameren Illinois

April 12, 2013

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8 **I. INTRODUCTION AND QUALIFICATIONS**

9 **Q. Please state your name and business address.**

10 A. My name is Leonard M. Jones and my business address is One Ameren Plaza,
11 1901 Chouteau Avenue, St. Louis, Missouri 63103.

12 **Q. By whom are you employed and in what capacity?**

13 A. I am employed by Ameren Illinois Company d/b/a Ameren Illinois (“AIC” or the
14 “Company”) as the Director of Rates and Analysis. I am responsible for supervising the
15 administration of AIC’s tariffs, regulated pricing, the development of AIC’s cost of
16 service studies, administration and maintenance of AIC’s tariffs, and coordinating
17 activity on other regulatory initiatives.

18 **Q. Please describe your educational background and relevant work experience.**

19 A. See my Statement of Qualifications, attached as an Appendix to this testimony.

20 **II. PURPOSE AND SCOPE**

21 **Q. What is the purpose of your direct testimony in this proceeding?**

22 A. The purpose of my direct testimony is to sponsor Ameren Illinois's peak time
23 rebate tariff, titled Rider PTR – Peak Time Rebate (Rider PTR). Rider PTR is shown in
24 Ameren Exhibit 1.1. In this testimony I explain certain features associated with the peak
25 time rebate program. I also describe certain terms and conditions of the tariff. Mr.
26 Gregory Weiss discusses the process for receiving funding from the Midwest
27 Independent Transmission System Operator, Inc. (MISO) and operational mechanics of
28 the program within MISO. I also sponsor changes to three other tariffs required prior to
29 implementing Rider PTR. These changes are contained in Ameren Exhibit 1.2.

30 **III. DISCUSSION**

31 **Q. Why is the Company filing Rider PTR?**

32 A. The filing is required as part of the Energy Infrastructure and Modernization Act
33 (EIMA) to offer a peak time rebate tariff. Specifically, Section 16-108.6(g) of the Public
34 Utilities Act (PUA) provides as follows:

35 (g) Within 60 days after the Commission approves a participating utility's AMI
36 Plan pursuant to subsection (c) of this Section, the participating utility, after consultation
37 with the Smart Grid Advisory Council, shall file a proposed tariff with the Commission
38 that offers an opt-in market-based peak time rebate program to all residential retail
39 customers with smart meters that is designed to provide, in a competitively neutral
40 manner, rebates to those residential retail customers that curtail their use of electricity
41 during specific periods that are identified as peak usage periods. The total amount of
42 rebates shall be the amount of compensation the utility obtains through markets or
43 programs at the applicable regional transmission organization. The utility shall make all
44 reasonable attempts to secure funding for the peak time rebate program through markets
45 or programs at the applicable regional transmission organization. The rules and
46 procedures for consumers to opt-in to the peak time rebate program shall include
47 electronic sign-up, be designed to maximize participation, and be included on the utility's
48 website.
49

50 Ameren Illinois' AMI plan was approved by the Commission on December 5, 2012. A
51 petition seeking approval of Rider PTR was submitted on February 1, 2012, within the 60
52 day limit provided for in the PUA.

53 **Q. What is a peak-time rebate program?**

54 A. A peak-time rebate program provides credits to customers for reducing electricity
55 usage below that of an established customer baseline load during a curtailment event.
56 The measure of estimated energy reduction is calculated by subtracting the customer's
57 actual usage during a Curtailment Period from the Customer Baseline Load (CBL) usage.
58 If the customer uses less energy during a Curtailment Period than usage established in the
59 CBL, a credit will be applied to such difference. If the customer uses more energy during
60 a Curtailment Period than the CBL quantity, no credit is applied and there is no penalty.
61 I will discuss the proposed CBL methodology in more detail later in my testimony.

62 **Stakeholder Input**

63 **Q. Did Ameren Illinois consult with the Smart Grid Advisory Council (SGAC)**
64 **prior to submitting its Rider PTR?**

65 A. Yes. Prior to the filing of its peak time rebate program, Ameren Illinois consulted
66 with the SGAC in a meeting held January 8, 2013. In addition, Ameren Illinois met with
67 stakeholders on January 23, 2013. AIC conducted a workshop on March 27, 2013
68 soliciting additional feedback. Ameren Illinois considered the input of the SGAC and
69 stakeholders in developing its proposed Rider PTR. Ameren Illinois also conducted a
70 stakeholder meeting in May 2012 concerning a draft peak time rebate tariff and concepts.
71 AIC has also monitored the Commonwealth Edison Company (ComEd) peak time rebate
72 tariff proceeding, Docket 12-0484, and has attempted to adjust AIC's proposal to address

73 concerns raised in that proceeding. I also note that AIC is actively participating in the
74 workshops conducted (and planned to be conducted) as a result of the Interim Order in
75 Docket 12-0484.

76 **Q. Did Ameren Illinois adjust Rider PTR in response to stakeholder feedback?**

77 A. Yes. The methodology for customer enrollment, placing a customer baseline
78 methodology within the tariff, and publishing of a PTR credit value in advance were all
79 shaped with stakeholder input. Each of these topics will be discussed later in my
80 testimony.

81 **Q. Are there additional stakeholder considerations that AIC is contemplating**
82 **that may impact filed Rider PTR?**

83 A. Yes. In the workshop held March 27, 2013, suggestions regarding calculation of
84 the annual PTR credit, and the course of action concerning situations where funding for a
85 program year has been depleted were offered. AIC believes the suggestions have merit,
86 and propose tariff modifications for consideration later in this testimony.

87 **Rider PTR**

88 **Q. Would you please summarize Ameren Illinois' PTR program?**

89 A. The Peak Time Rebate (PTR) Program is designed as an opt-in market-based
90 demand response program which provides bill credits to participating residential retail
91 customers for kilowatt-hours (kWh) of estimated energy reduction achieved by such
92 customers during specific periods that are identified as peak usage periods (Curtailment
93 Periods). During a Curtailment Period, temporary reductions in electric usage for
94 participating customers connected to the Company's electric delivery system are

95 requested. The total amount of rebates to these customers is the amount of compensation
96 Ameren Illinois obtains through markets or programs at the applicable regional
97 transmission organization, in this instance the MISO.

98 **Availability of Service**

99 **Q. Which customers may take service under the Ameren Illinois Rider PTR?**

100 A. The PTR program is available to all residential customers for which Advanced
101 Meter Infrastructure (AMI) facilities, as defined as smart meters in Section 16-
102 108.5(b)(1)(B)(i) of the Act, are installed and in operation at such customer's premises.
103 The program is available to said customers on a competitively neutral basis, meaning that
104 a customer's choice of power supplier alone will not influence eligibility for Rider PTR.
105 Rider PTR service will begin operating coincident with the MISO planning year
106 beginning June 1, 2016.

107 AIC's customers participating on its Rider NM – Net Metering (Rider NM) and
108 Rider QF – Qualifying Facilities (Rider QF) tariffs will be restricted from Rider PTR due
109 to the complexity of determining baselines and savings estimates for such customers,
110 comparable to what was approved for ComEd. The restriction is addressed through
111 changes to Riders NM and QF, shown in Ameren Exhibit 1.2, pages 2 and 3.

112 **Q. Is there a specific time period during which eligible customers may enroll in**
113 **the PTR program?**

114 A. Residential customers elect service by notifying the Company during the period
115 beginning October 1 and extending through the following March 1, for PTR service
116 beginning with the first subsequent MISO Planning Year (June – May). Notification may
117 be made through the electronic enrollment process available on the Company's internet

118 site or by other communication channels including but not limited to telephone. The
119 enrollment timeline coincides with the MISO's planning schedule. As discussed by Mr.
120 Weiss, MISO calls for AIC's capacity data, including any Load Modifying Resources
121 (LMR) registrations, by February. Ending enrollment for the upcoming MISO Planning
122 Year by March 1 provides a greater degree of certainty that the LMR bid matches loads
123 of participants. A later enrollment window would invite undue speculation as to the final
124 number of participants, posing challenges around establishing the amount of the PTR
125 credit as well as the amount of PTR response during a PTR curtailment event.

126 **Q. Will Ameren Illinois accept PTR registration from customers after March 1?**

127 A. Yes, although residential customers that provide notification to the Company
128 during the period beginning March 2 and extending through September 30 will not
129 normally commence service until the start of the first subsequent MISO Planning Year
130 beginning after such September 30.

131 Customers that provide notice beginning March 2 and extending through
132 September 30 will be placed on a waiting list and may be able to commence service after
133 previously active customers (those who enrolled prior to March 1) cancel service.
134 Movement from the waiting list to active service shall be determined by amount of time
135 on the waiting list, with customers first on the waiting list to be the first to become
136 eligible. Waiting list customers shall become active participants starting with their first
137 full billing period after movement from the waiting list. This methodology recognizes
138 that residential account turnover, which averages 20-25% annually, is likely to occur
139 within the PTR enrollment list. Allowing new PTR enrollments to backfill those that
140 drop PTR service helps AIC meet MISO LMR capacity quantities submitted during the

141 registration process, and allows additional customers to participate sooner than otherwise
142 possible.

143 **Q. Can a customer participate in more than one MISO-sponsored LMR**
144 **program at the same time?**

145 A. No. MISO requires verification that customer demand is not registered under
146 more than one LMR program at a time. Accordingly, proposed Rider PTR contains a
147 “termination of service” provision that allows AIC to remove customers from Rider PTR
148 service if it is determined that the reductions in energy made by such residential customer
149 in accordance with the provisions of Rider PTR are also being made in accordance with
150 the provisions of an energy curtailment program offered by another entity.

151 **Q. What steps will Ameren Illinois take to ensure a customer’s Retail Electric**
152 **Supplier (RES) is aware that said customer is registered under Rider PTR?**

153 A. Rider PTR contains a provision that by electing service under Rider PTR, the
154 customer authorizes the Company to notify the Customer’s RES of the customer’s
155 election to take service under Rider PTR, or upon inquiry from the Customer’s RES, to
156 acknowledge the customer is taking such service. Also, AIC proposes additional wording
157 be added within its Supplier Terms and Conditions that expressly states information shall
158 be exchanged between the Company and RES via Electronic Data Interchange (EDI)
159 when a customer elects to participate in, or change participation in, a MISO-coordinated
160 electric demand response program or an energy curtailment program. The proposed
161 language also reiterates that a service point may not be concurrently enrolled to both a
162 Company-coordinated demand response and a MISO-coordinated demand response
163 program or an energy curtailment program offered by a RES. The proposed tariff

164 language to be added to the Supplier Terms and Conditions is contained in Ameren
165 Exhibit 1.2, page 1.

166 **PTR Credits and Events**

167 **Q. What is the per kWh credit provided to PTR participants for reducing load**
168 **during a Curtailment Event?**

169 A. The PTR credit will be established annually after each MISO capacity auction in
170 advance of the MISO planning year. AIC proposes to use a formula to calculate the
171 credit values each year. The formula is based on the amount of funding received from
172 MISO for registered LMR's (further discussed by Mr. Weiss), divided by the expected
173 net kWh reduction experienced from initiating Curtailment Events. The credits assume
174 that a total of 20 event hours will be called during the MISO planning year, and will
175 attempt to set a PTR credit floor of \$0.50/kWh. If funding from MISO programs is
176 insufficient to generate a credit of at least \$0.50/kWh, fewer than 20 event hours may be
177 used.

178 The PTR credit shall be shown on an information filing supplemental to Rider
179 PTR and filed with the ICC annually prior to the start of the MISO Planning Year.

180 **Q. Did development of the PTR Credit receive feedback during the stakeholder**
181 **process?**

182 A. Yes. In the stakeholder meeting on March 27, 2013, it was suggested that in the
183 event MISO program funding is insufficient to generate a PTR credit of \$0.50/kWh,
184 fewer hours than 20 be used to calculate the PTR Credit, but not less than 6 hours. The
185 provision of setting a floor for the number of event hours is new, and would require a
186 change to proposed Rider PTR. AIC is agreeable to such a provision. Language on

187 Sheet 51.004 would need to be adjusted (as underlined) to state “Fewer than 20 event
188 hours, but not less than 6 event hours, may be used if the funding from the MISO
189 Programs is insufficient to generate a credit of at least \$0.50/kWh.”

190 Given the low price of capacity associated with the recently conducted MISO
191 capacity auction (see Mr. Weiss’ testimony), the 6 hour minimum provision would likely
192 have been used to establish PTR Credits had the program been operational next year. I
193 do not know what the MISO capacity auction will yield for service in the 2016 MISO
194 planning year, but the recent result indicates that inserting a 6 hour minimum addresses
195 an issue that may arise if the capacity market remains at or near today’s price levels.

196 **Q. What is a Curtailment Event?**

197 A. A Curtailment Event may be either a Scheduled Event or an Emergency Event. A
198 Scheduled Event is a curtailment specified by the Company during a period of high
199 demand within the Company’s local balancing authority and is expected to occur during
200 the Summer months between the hours of 10 am and 10 pm. An Emergency Event is a
201 curtailment declared by the MISO for all load registered as a LMR to reduce electric load
202 by the amount of the LMR. An Emergency Event may occur at any time and may be
203 called due to capacity and transmission emergencies.

204 **Q. How will Ameren Illinois determine the number and duration of Curtailment**
205 **Events in a year?**

206 A. The number of Scheduled Events will generally be limited to no more than the
207 total number of hours used to determine the PTR Credit amount. Proposed Rider PTR
208 provides a guideline that a Scheduled Event is likely to be a minimum of 2 hours but no
209 more than 6 hours. Assuming funding is sufficient to allow use of 20 event hours, at an

210 average of 4 hours per event, AIC would be expected to initiate up to 5 curtailment
211 events. Because Emergency Events may occur at any time and duration, AIC would
212 likely endeavor to conservatively manage Scheduled Events so that funding for an
213 Emergency Event is available should it be needed. PTR Credits ideally will be provided
214 in an amount equal to the compensation received by the Company through applicable
215 MISO programs.

216 **Q. What happens if PTR Credits provided to customers in a MISO Planning**
217 **Year exceeds funding received from MISO Programs?**

218 A. Per the proposed tariff (page 5 of 7 paragraph 2), if the Company has provided or
219 is estimated to provide credits from operation of Curtailment Events equal to or greater
220 than funding from MISO Programs for the MISO Planning Year, no additional Scheduled
221 Events will be called for the remainder of the MISO Planning Year. In the event the
222 MISO subsequently declares an Emergency Event, the Company will credit participants
223 the PTR credit stated in the Rider PTR Informational Sheet for the first such event
224 provided this tariff is to be operative¹ in the next MISO Planning Year. In the event the
225 MISO subsequently declares an Emergency Event and this tariff is to be inoperative in
226 the next MISO Planning Year or if more than one Emergency Event is subsequently
227 called, the PTR shall be zero (0) for such Emergency Event(s).

228 **Q. Was the potential for a zero PTR credit discussed at the March 27, 2013**
229 **workshop?**

¹ The peak time rebate program is authorized in Section 16-108.6(g) of the PUA. Section 16-108.6(h) states that if Section 16-108.5 of the PUA becomes inoperative, so does Section 16-108.6. Section 16-108.5 pertains to a participating utility's ability to operate under formula rates.

230 A. Yes. Workshop participants favored AIC continuing to fund the PTR credit even
231 if more than one Emergency Event is subsequently called. In such situations, funding
232 would be borrowed from the next year. In other words, funds paid to customers in the
233 immediate MISO Planning Year would reduce funding, and thus PTR credits, in the next
234 MISO Planning Year. AIC is open to modifying Rider PTR accordingly, provided Rider
235 PTR is expected to be operative in the next MISO Planning Year. Language in proposed
236 Rider PTR on Sheet 51.004 would need to be adjusted as follows: “In the event the MISO
237 subsequently declares an Emergency Event, the Company will credit participants the PTR
238 stated in the Rider PTR Informational Sheet ~~for the first such event~~ provided this tariff is
239 to be operative in the next MISO Planning Year.”

240 If Rider PTR is expected to be inoperative in the next MISO Planning Year, I
241 continue to recommend the PTR credit be equal to zero if funds have been depleted and
242 MISO subsequently calls an Emergency Event. Note that Section 16-108.6(g) of the
243 PUA calls for the “total amount of rebates to be the amount of compensation the utility
244 obtains through markets or programs at the applicable regional transmission organization.”
245 Thus, funds from a future year are not available from which to borrow.

246 **Q. If Ameren Illinois has funding remaining after a MISO Planning Year, then**
247 **how are the funds used?**

248 A. Such funds would be accrued for providing credits in the next program year.
249 In Docket No. 12-0484 (the ComEd Rider PTR proceeding), the Commission concluded
250 that it is reasonable to allow the Company to carry surplus credit resources over to the
251 following year. (Docket No. 12-0484, Interim Order, p. 9)

252 **Q. What is the process for notifying customers of Curtailment Events?**

253 A. In the event that a Curtailment Period is designated by the Company, the
254 Company will issue a notification to each participating customer at least one hour prior to
255 the start of such Curtailment Period. Such notification is issued through electronic mail,
256 automated telephone message, text message, or other available and applicable
257 communications protocol and must include the start time of such Curtailment Period and
258 the duration of such Curtailment Period. The Company does not guarantee that a
259 Customer receives such notification, only that one will be provided. For a Scheduled
260 Event, the Company will make reasonable attempts to provide notice by 9 pm of the
261 preceding day, which is comparable to the process for notifying residential customers
262 participating on AIC's Rider PSP – Power Smart Pricing. The Company will also
263 provide a courtesy notice to RES's registered to serve residential customers of the
264 impending Curtailment Event.

265 **Q. Will Ameren Illinois remove customers from Rider PTR if they do not**
266 **reduce load during Event Periods?**

267 A. No. Ameren Illinois considered a provision that would have allowed removing
268 customers from the program if the customer's usage during a Curtailment Event was
269 significantly greater than baseline usage. This provision was removed after discussion
270 with the SGAC in early January. While it was recognized that customers acting counter
271 to expectations (i.e., use more energy during Curtailment Events rather than less) serve to
272 dilute available funding for all Rider PTR participants, such a provision was deemed
273 premature in the incipient stages of the PTR program.

274 **Q. Does Rider PTR require a minimum term?**

275 A. No. Customers may elect to terminate Rider PTR service at any time. Customers
276 may cancel PTR service via electronic termination process available on the Company's
277 internet site or by other communication channels including but not limited to telephone.
278 PTR service termination will be effective on the next normally scheduled meter reading
279 or billing cycle date for the customer that occurs at least seven calendar days after the
280 Company receives cancellation notification.

281 **CBL Methodology**

282 **Q. Earlier you stated that Rider PTR participants are paid based on usage**
283 **during a Curtailment Event that is less than usage determined in a Customer**
284 **Baseline Load. How will Ameren Illinois determine the CBL?**

285 A. The CBL will be unique to a customer and based on the individual residential
286 customer's hourly electric energy usage during a period of time that does not occur
287 during a specific Curtailment Period, but that corresponds to such specific Curtailment
288 Period. Such hourly electric energy usage is determined by identifying the 14 previous
289 days that are not holidays or Curtailment Event days. Next, the Temperature Humidity
290 Index (THI) and kWh for the Curtailment Period hours are compiled for each day and
291 each customer. The days with the three highest kWh values during the hours of the
292 Curtailment Period are used in an average for each customer, excluding any day not
293 within 10% of the THI for the Curtailment Event day. If all three days are outside the 10%
294 THI threshold, the CBL shall equal the kWh for the highest load day.

295 **Q. What temperature data will be used to determine the THI for an individual**
296 **customer?**

297 A. The Company's billing system presently provides average monthly temperature
298 data on customer bills. Such data originates from one of four independent weather
299 services from stations in Peoria, Decatur, Belleville, and Marion, corresponding to
300 Northern, Central, South Central, and Southern regions served by the Company,
301 respectively. The same weather service and regions will be used to determine the THI
302 applicable to a customer.

303 **Q. What criteria did you use in developing the proposed CBL methodology?**

304 A. AIC favored a CBL methodology that customers could verify by examining their
305 usage history and provided a good estimate of usage that would have occurred if no
306 Curtailment Event had been called.

307 **Q. Does MISO's tariff contain a standard CBL methodology used in the LMR
308 registration process described by Mr. Weiss?**

309 A. Yes. The MISO methodology utilizes a simple average of recent days. For
310 CBL's corresponding to a weekday curtailment event, MISO uses 10 most recent
311 weekdays that are not holidays or event days, but not less than five days. For CBL's
312 corresponding to weekend events, MISO uses the four but not less than two most recent
313 weekend or holidays that are not "event" days. In AIC's estimation, the standard MISO
314 methodology would not appropriately account for potential residential usage fluctuations
315 normally attributed to fluctuations in daily summer temperatures.

316 The MISO Tariff does allow for a Weather Sensitive Adjustment factor; however,
317 this adjustment calls for a mathematical relationship to be derived through a regression
318 analysis that considers the resource load, historical hourly temperature data, and any
319 other important factors determining the resource's load. This method was deemed

320 impractical from a customer and an AIC perspective. A regression analysis would be
321 difficult for a residential customer to duplicate, verify, and understand. AIC believes that
322 the CBL methodology should be easily understood by customers, and verifiable with
323 available information. AIC's proposed CBL methodology accomplishes that goal.
324 Second, a regression approach would be difficult (and more costly) for AIC to calculate,
325 administer and bill for potentially several thousands of accounts. AIC's proposed CBL
326 methodology incorporates a weather component, is practical to administer, and will likely
327 be more easily understood by customers.

328 **Q. Can AIC use different CBL methodologies to manage the LMR registration**
329 **process with MISO and apply credits to Rider PTR customers?**

330 A. Yes, although ease of administration and consistency calls for using the same
331 CBL methodology within both the MISO LMR process and Rider PTR. AIC must
332 provide a study to MISO associated with the LMR registration process, demonstrating its
333 expectations for total reduction of load. If approved by MISO, this quantity forms the
334 basis for AIC's offer into the MISO auction and once cleared will provide the dollars
335 associated with PTR credits. Using the same CBL approach to determine funding and to
336 provide credits to customers offers the best relationship between cost causation and
337 pricing. Accordingly, AIC will likely seek approval from MISO to use the CBL
338 methodology contained in Rider PTR when registering its LMRs.

339 **Q. How is the Customer Baseline treated in the event of a service interruption?**

340 A. Per the proposed Tariff (page 5 of 7 paragraph 3), in the event that during a
341 Curtailment Period there is an interruption in the delivery of electricity to the residential

342 customers' premises, the kWhs in such residential customer's CBL profile associated
343 with the span of time over which such interruption occurs are set to zero.

344 **PTR Cost Recovery and Tracking**

345 **Q. How does Ameren Illinois plan to recover the costs of implementing the PTR**
346 **program?**

347 A. AIC proposes to recover the costs of implementing the PTR program, including
348 start-up and administrative costs and the cost of preparing the evaluation reports to the
349 Commission, from all residential customers through their delivery service charges. That
350 is, AIC does not propose at this point to allocate any of the PTR program costs
351 specifically to PTR customers. As a participating utility under Section 16-108.5(c) of the
352 PUA, the recovery of PTR program costs through delivery service rates will be
353 implemented through AIC's performance-based formula rate mechanism.

354 This cost recovery methodology conforms to the Commission's Interim Order in
355 Docket No. 12-0484, which conditionally approved ComEd's Rider PTR. In that
356 proceeding, the Commission agreed that program costs should be recovered from all
357 residential customers. (Docket No. 12-0484, Interim Order, p 23)

358 **Q. In the Docket No. 12-0484 Interim Order it was suggested that the issue of**
359 **sharing services between the Company's Rider PTR and a PTR program conducted**
360 **by a RES be considered in workshops. Is Ameren Illinois participating in those**
361 **workshops?**

362 A. Yes. AIC participated in the initial workshop held April 3, 2013 and plans to
363 participate in subsequent workshops. The workshops will address PTR services for

364 suppliers, AMI data and sharing with RES, bill presentment, and issues surrounding
365 curtailment notifications.

366 **Other Tariff Provisions**

367 **Q. Does Ameren Illinois plan on filing annual reports with the Commission**
368 **concerning their Rider PTR Program?**

369 A. Yes. Ameren Illinois will submit a report to the Commission no later than
370 September 1st of each year, beginning in 2017, that evaluates the implementation,
371 operation, and administration of the provisions of Rider PTR during the previous MISO
372 planning year. That report will include information concerning the number of customers
373 served, changes in electricity patterns, compensation received from MISO programs,
374 credits provided to customers, an assessment of the value of the availability of the rider,
375 and recommendations, if any, concerning modifications to the Rider.

376 **Approval of Rider PTR**

377 **Q. Why does Ameren Illinois seek the Commission's approval of the PTR**
378 **program filing by January 2, 2014?**

379 A. Ameren Illinois requests approval of the PTR program by January 2, 2014 to
380 allow adequate time to develop and build billing software required to administer the
381 program.

382 **Q. What is your recommendation?**

383 A. I recommend that the Commission approve the Ameren Illinois Rider PTR – Peak
384 Time Rebate with the modifications discussed above.

385 IV. CONCLUSION

386 Q. Does this conclude your direct testimony?

387 A. Yes, it does.

APPENDIX

**STATEMENT OF QUALIFICATIONS OF
LEONARD M. JONES**

I graduated from Western Illinois University with a Bachelor of Arts Degree in Economics in 1987. In 1988, I received a Master of Arts Degree in Economics, also from Western Illinois University. From 1988 through 2004 I was employed by Illinois Power Company ("Illinois Power") as a Rate Analyst, Senior Rate Analyst, Rate Specialist, Team Leader - Costing and Economic Services, and Director – Business Planning and Forecasting. Shortly after completion of Ameren Corporation's ("Ameren") acquisition of Illinois Power, I became Managing Supervisor – Restructured Services, Regulatory Policy and Planning. In 2008, I was promoted to my current position.

I previously testified before the Illinois Commerce Commission in Docket No. 91-0335, regarding Illinois Power's electric marginal cost of service study; Docket No. 93-0183, regarding Illinois Power's gas marginal cost of service study; Docket No. 98-0348, regarding Illinois Power's proposed Rider DA-RTP II; Docket No. 98-0680, regarding the investigation concerning certain tariff provisions under Section 16-108 of the Public Utilities Act and related issues; Docket No. 98-0769, regarding requirements governing the form and content of contract summaries for the 1999 Neutral Fact Finder; Docket Nos. 99-0120 & 99-0134 (Cons.) regarding approval of Illinois Power's Delivery Service Implementation Plan and Tariffs; Docket Nos. 00-0259/00-0395/00-0461 (Cons.) regarding proposed Rider MVI and revisions to Rider TC; Docket 01-0432 regarding electric Delivery Service Tariff rate design and related matters; Docket 04-0476 regarding gas rate design; Docket Nos. 06-0070/06-0071/06-0072 (Cons.) regarding electric Delivery Service Tariff rate design and related matters; Docket Nos. 06-0691/06-

0692/06-0693 (Cons.) regarding residential real-time pricing tariffs; Docket 06-0800 regarding an investigation into changes to auction process and the Ameren Illinois Utilities' market value tariffs (Rider MV); Docket 07-0165 regarding an investigation into the Ameren Illinois Utilities' rate design; Docket 07-0527 regarding tariff changes resulting from passage of the IPA Act; Docket 07-0585 – 07-0590 (cons.) regarding electric rate design; Docket 07-0539 regarding electric energy efficiency programs; Docket 08-0104 regarding gas energy efficiency programs; Docket 09-0306 – 09-0311 (cons.) regarding electric rate design; Docket 09-0535 regarding Rider EDR and GER reconciliation; Docket 10-0095 regarding tariff changes required for on-bill financing programs; Docket 10-0517 regarding a petition for an accounting order; Docket Nos. 11-0279 and 11-0282 (Cons.) regarding electric Delivery Service Tariff rate design and related matters; Docket 11-0354 – 11-0356 (cons.) regarding reconciliation of power procurement costs with expenses; Docket 11-0358 regarding purchase of uncollectible receivables tariff provisions; Docket 11-0383 regarding Rider TS-Transmission Service reconciliation; Docket 12-0001 regarding initiation of electric formula ratemaking through Rate MAP-P – Modernization Action Plan – Pricing; Docket 12-0244 regarding approval of AIC's AMI plan; and Docket 12-0293 regarding Rate MAP-P annual update filing.